

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MS DANCY a/k/a DENA WALLACE,

Plaintiff,

-against-

WESTCHESTER ALP MANAGEMENT, LLC, d/b/a  
WESTCHESTER CENTER FOR INDEPENDENT AND :  
ASSISTED LIVING and JOEL ROTHMAN Individually, :

Defendants.  
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: Index No.: 21-cv-03866 (JGK)

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**RULE 26(f) REPORT**

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Pursuant to the Court's June 28, 2021 Order (ECF No. 12) and Rule 26(f) of the Federal Rules of Civil Procedure, the parties conferred pursuant to Rule 26(f) and jointly propose the following deadlines.

**Rule 26(f)(3) Topics:**

1. The timing of discovery:

The Parties propose the following discovery schedule:

The parties shall exchange disclosures required by FED. R. CIV. P. 26(a)(1): August 6, 2021

Deadline to amend pleadings: August 23, 2021

The parties shall exchange Interrogatories and Requests for Documents: August 23, 2021

Completion of fact discovery: November 19, 2021

Expert disclosures, if any, must be made by: December 3, 2022

Completion of expert discovery: January 3, 2022

USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: 7/26/2021
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2. The topics of discovery: Discovery will be sought regarding all documents relevant to the claims and defenses in the action, including, but not limited to Defendant's investigation report; documents regarding Plaintiff's pregnancies, leaves relating to pregnancy, performance, complaints to and about Defendant Rothman; and Defendant's policies and procedures pertaining to discrimination and retaliation in the workplace, pregnancy-related leave, and COVID-19 testing.
3. The Parties will meet and confer regarding the form in which electronically stored information should be produced.
4. The Parties do not anticipate any disputes about claims of privilege or protection at this time. The Parties plan to enter into separate stipulations concerning confidentiality and the claw-back of privileged communications which they shall attempt to negotiate and submit to the Court for its approval.
5. The Parties do not anticipate any changes in the limitations on discovery imposed under the Federal Rules of Civil Procedure.
6. At this time, there are no other orders that the Court should issue under Rule 26(c) or Rule 16(b) and (c).

Dated: July 23, 2021

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*Dispositive Motions due 4/28/22. Joint Pre-Trial Order  
due 2/18/22 or 3 weeks after decision / any dispositive motion.  
Ready-Trial, 48 hours notice 1/3/22.  
So ordered.  
7/26/21 JLG/Kelt/US.D.D.*